

**IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE:** **MAY BETH MOORE**  
**Debtor**

**CHAPTER 11**  
**CASE NO. 21-50461-KMS**

**APPLICATION TO EMPLOY ATTORNEYS,  
AND DISCLOSURE OF COMPENSATION**

COMES NOW May Beth Moore (the “Debtor”), and files this her Application to Employ Attorneys, and Disclosure of Compensation, and in support thereof, would show unto the Court the following, to-wit:

1. On April 16, 2021, the Debtor herein filed with this Court her original Petition for reorganization under Subchapter V of Chapter 11 of the Bankruptcy Code.
2. In order to facilitate the prudent performance of her duties and the successful operation of her business under this reorganization proceeding, it is necessary for the Debtor-in-possession to employ legal counsel. The professional services for which said attorneys will be retained to render shall include the following:
  - a. To advise and consult with the Debtor-in-possession regarding questions arising from certain contract negotiations which will occur during the operation of business by the Debtor-in-possession;
  - b. To evaluate and attack claims of various creditors who may assert security interests in the assets and who may seek to disturb the continued operation of the business.
  - c. To appear in, prosecute, or defend suits and proceedings, and to take all necessary and proper steps and other matters and things involved in or connected with the affairs of the estate of the Debtor;
  - d. To represent the Debtor in court hearings and to assist in the preparation of contracts, reports, accounts, petitions, applications, orders and other papers and documents as

may be necessary in this proceeding;

- e. To advise and consult with Debtor in connection with any reorganization plan which may be proposed in this proceeding and any matters concerning Debtor which arise out of or follow the acceptance or consummation of such reorganization or its rejection; and
- f. To perform such other legal services on behalf of Debtor as they become necessary in this proceeding.

3. The Debtor desires to employ the Law Offices of Craig M. Geno, PLLC (the "Law Firm") for the performance of these legal services. The Law Firm, whose offices are in Ridgeland, Mississippi, are fully competent to advise the Debtor-in-possession on all matters which are anticipated to arise in the functioning of this case and to protect and preserve all rights of the Debtor and the interests of creditors. The Debtor desires to employ the Law Firm at the following hourly rates: Craig M. Geno at \$375.00 per hour, plus expenses; Associates at \$275.00 per hour, plus expenses; and Paralegals at \$185.00 per hour, plus expenses; and has caused to be paid to the Law Firm a retainer of \$7,300.00, which includes the \$1,738.00 filing fee, less pre-petition time, to be applied to fees and expenses in this case. The Law Firm will bill at the rates set forth herein and, if necessary, submit requests for compensation to the Court for approval.

4. The Law Firm is now counsel for the Debtor, and as represented in the Affidavit attached hereto as Exhibit "A", it represents no interests adverse to the Debtor or her estate and matters upon which it is to be engaged and its employment would be in the best interest of this estate. To the best of the Debtor's knowledge, the Law Firm has no connection with the creditors herein or any other party-in-interest or their respective attorneys and accountants, or with the Office of the United States Trustee, or any employees of the Office of the United States Trustee, which are

prohibited, which would interfere with or hinder the performance of its duties herein, or which need to be described herein, except that the Law Firm also represented Billy R. Moore, the Debtor's ex-spouse, in his (now closed) Chapter 11 case, and Eagle Rebar and Cable Co., Inc., whose equity security interests are owned, in part, by the Debtor, in its (now closed) Chapter 11 case. Those prior representations do not cause the Applicant to be disinterested. Mr. Moore and Eagle Rebar have consented to this representation, as has the Debtor.

WHEREFORE, the Debtor requests that she be authorized to employ and appoint the Law Firm as his attorneys and legal counsel, effective April 16, 2021. The Debtor prays for general relief.

THIS, the 6<sup>th</sup> day of May, 2021.

Respectfully submitted,

MAY BETH MOORE

By Her Attorneys,

LAW OFFICES OF CRAIG M. GENO, PLLC

By:   
\_\_\_\_\_  
Craig M. Geno

OF COUNSEL:

Craig M. Geno; MSB No. 4793  
LAW OFFICES OF CRAIG M. GENO, PLLC  
587 Highland Colony Parkway  
P. O. Box 3380  
Ridgeland, MS 39158-3380  
601-427-0048 - Telephone  
601-427-0050 - Facsimile  
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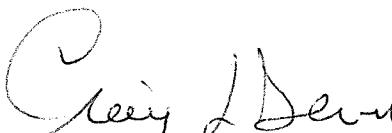
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**CERTIFICATE OF SERVICE**

I, Craig M. Geno, do hereby certify that I have caused to be served this date, via Notice of Electronic Filing, a true and correct copy of the above and foregoing instrument to:

Christopher J. Steiskal  
Office of the United States Trustee  
christopher.j.steiskal@usdoj.gov

THIS, the 6<sup>th</sup> day of May, 2021.

  
\_\_\_\_\_  
Craig M. Geno

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SOUTHERN DISTRICT OF MISSISSIPPI**

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**EXHIBIT “A”**

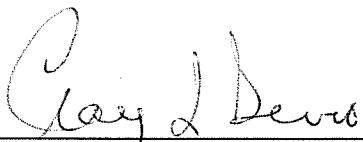
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**AFFIDAVIT**

PERSONALLY APPEARED BEFORE ME, the undersigned authority, in and for the jurisdiction aforesaid, Craig M. Geno (the "Affiant") of the Law Offices of Craig M. Geno, PLLC ("the Law Firm"), attorneys for the Debtor, who after having been by me first duly sworn, stated on oath that this Affidavit is filed herein in support of the Application to Employ Attorneys, and Disclosure of Compensation (the "Application"), that the Law Firm now represents the Debtor, it represents no interests adverse to the Debtor or her estate and matters upon which it is to be engaged, and the Law Firm's employment would be in the best interest of this estate. To the best of the Affiant's knowledge, the Law Firm has no connections with the creditors herein or any other party-in-interest or their respective attorneys and accountants, or with the Office of the U. S. Trustee, or any employees thereof, which are prohibited, which would interfere with or hinder the performance of its duties herein, or which need to be described herein, except that the Law Firm also represented Billy R. Moore, the Debtor's ex-spouse, in his (now closed) Chapter 11 case, and Eagle Rebar and Cable Co., Inc., whose equity security interests are owned, in part, by the Debtor, in its (now closed) Chapter 11 case. Those prior representations do not cause the Applicant to be disinterested. Mr. Moore and Eagle Rebar have consented to this representation, as has the Debtor. The Affiant hereby makes application for the employment of the Law Firm as attorneys and legal counsel for the Debtor.

  
\_\_\_\_\_  
Craig M. Geno

STATE OF MISSISSIPPI  
COUNTY OF Hinds

SWORN TO AND SUBSCRIBED BEFORE ME, this the 6<sup>th</sup> day of May, 2021.



Kathryn Carter  
NOTARY PUBLIC